MB. J. R. LAMAN

MR. J. R. KESSLER \* AKRON

Forestone INTEROFFICE

NOV 1 0 12

MEMORANDUM

NOVEMBER 6, DATE

FROM G.W.WAMSLEY

REFERRING TO LETTER OF

SUBJECT

SANITARY LANDFILL OPERATION - POTTSTOWN CHEMICAL PLANT PVC SLUDGE

RECEIVED NOV 13 1975

J. R. LAMAN The following information is being submitted so that management of both the tire division and the chemical division is fully aware of the present situation on the sanitary landfill.

The chemical plant clarifier is now producing an average of six (6) dumpster loads of sludge -- and frequently seven loads per day. 6 loads x 5 yards x  $1800 \#/\text{yard} \times 25 \text{ days} = 1,350,000 \#$ of sludge/month. Using a 50% moisture content for the sludge, this amounts to 675,000# of dry solids per month, which is about 5% of the average monthly resin production. All other plant debris and trash averages about 25 tons per day (20% of which is from the chemical and plastics divisions). 25 tons x 2000# x 25 days = 1.250,000%/month. As can be readily seen, more sludge is presently being hauled to the landfill than trash. Large quantities of sludge, such as this, cause a very difficult handling problem for our landfill operator. The "toothpaste like" consistency makes it impossible to drive over or mix with other trash.

The chemical leachate problem caused by disposing of this volume of sludge on the landfill is one of the main reasons why we now have a pollution problem in the water table beneath the landfill. We have spent over \$30,000 on engineering in the last year evaluating this problem. Another \$30,000 will be necessary to complete the work and present an acceptable program to the Pennsylvania DER. We have requested funds (\$90,000 in 1976) to expand the landfill northward into the low area adjacent to the chemical plant warehouse. An additional \$200,000 may be necessary to contain and control the leachate from the landfill and sludge lagcons. If we do not get approval from corporate management to continue these plans, or if the State DER does not approve our program, it will be necessary to insist that dumping of sludge on the landfill be stopped completely! Hauling the daily accumulation of sludge off site could cost as much as \$8,000/month.

The four unlined chemical plant sludge lagoons also present an enormous potential problem. If we are required to remove this estimated 120,000 cubic yards of sludge from these lagoons, it will cost us a minimum of \$600,000 to have it hauled off site to

an acceptable landfill as there is no way we could handle that volume on our landfill. Unless we obtain approval for the expanded landfill, which takes into account leaving the sludge in place and controlling the leachate, this expense will become a reality.

The 35% of the operating costs that the chemical plant is being assessed for landfill operation is grossly unfair to the tire division. Disposal of this sludge is perhaps analogous to the USA's energy crisis. On site disposal has been cheap, and this has resulted in a lack of incentive to initiate alternative measures. However, on site disposal of this large volume of sludge has become an unmanageable situation. Alternatives must be considered. Efforts should be continued toward recycling this sludge or drying it as a salable product.

We cannot overstress the seriousness of this problem. A tremendous financial burden in off site hauling expenses, trash handling equipment, as well as the expenses listed above for existing pollution problems could result if our complete plans for landfill operation and pollution monitoring are not approved. It is also imperative that we get approval to move into the new area. The Pottstown complex has much to lose if this program is rejected. Cooperation and a complete understanding of the facts by both the tire and chemical division is essential. Corporate management should be made aware of the complexity and the seriousness of this situation, and the consequences that could result.

G. W. WAMSLEY/P. J. MCKENNA

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